

Exhibit 2

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

TROOPER 1,

Plaintiff,

vs.

Case No.:
22-CV-00893

NEW YORK STATE POLICE, ANDREW
CUOMO, MELISSA DEROSA and
RICHARD AZZOPARDI,

Defendants.

June 1, 2023
10:26 a.m.

* * * C O N F I D E N T I A L * * *
Remote video-teleconference deposition of
JENNIFER GOTTSTINE, taken by Plaintiff, held at
Harris Beach, PLLC, 677 Broadway, Albany, New York,
pursuant to notice, before Elizabeth F. Tobin, a
Registered Professional Reporter and Notary Public
of the State of New York.

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2 Q. Further down it says, "Didn't want to say
3 anything, do I have to tell the truth."

4 Do you see that?

5 A. Yes.

6 Q. Is that DeChiro relating to you things
7 that Trooper 1 said to her?

8 A. No.

9 Q. What do those notes mean?

10 A. I believe DeChiro just never wanted to
11 speak ill of anyone.

12 Q. So what did she not want to speak about
13 that she's talking about here?

14 A. Just general topics and other things that
15 I possibly had asked her before or during this time
16 I spoke with her.

17 Q. Like what topics?

18 A. The next one down, Scott McMahon. She
19 didn't feel like he may tell the truth if questioned
20 about -- I don't know what, but then he did, she
21 states.

22 Q. What was Scott McMahon not going to tell
23 the truth about?

24 A. I do not know. I did not get into that.

25 Q. DeChiro is -- who is speaking, whose

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2 words are you relating when it says on this page,

3 "Do I have to tell the truth"?

4 A. That is Ellen.

5 Q. And she was saying -- she was

6 wondering -- she was asking you if she needed to

7 tell the truth about Scott McMahon?

8 MR. STEELE: Object to form.

9 You can answer.

10 A. I am not sure.

11 Q. Moving on to 93, do you see towards the

12 middle of the page there's a line that says

13 "everyone knew"?

14 A. Yes.

15 Q. What does that mean?

16 A. I believe that was after the report came

17 out.

18 Q. And what does it mean?

19 A. That people probably were able to figure

20 out who Trooper 1 was.

21 Q. Going down to 94, who are you speaking

22 with on November 8, 2021?

23 A. Darren Danko.

24 Q. What was his rank?

25 A. I am not sure if was he a trooper or an

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2 investigator.

3 Q. He's a member of the PSU; right?

4 A. Correct.

5 Q. Do you see a long arrow here in the left
6 margin and then write, "GAC ran it, Vincent Straface
7 never stood up."

8 Does that mean that this trooper thought
9 that Governor Andrew Cuomo ran the PSU and Vincent
10 Straface never stood up to him?

11 MR. STEELE: Object to form.

12 You can answer.

13 MS. TRZASKOMA: Object to form.

14 A. It may have been his perception in some
15 instances that the governor would make
16 recommendations and Vinny would comply.

17 Q. Did he give you any examples of that?

18 A. No.

19 Q. Going a little bit further back up, do
20 you see where it says, "Everyone afraid to speak
21 up"?

22 A. Yes.

23 Q. What were people afraid to speak up
24 about?

25 A. People were afraid to not drive fast or